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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

ÖZCAN GENÇ, HASAN GÖKÇE, and)
SÜLEYMAN KÖŞ, on behalf of themselves)
and all others similarly situated,)

Plaintiffs,)

vs.)

IMPERIAL PACIFIC INTERNATIONAL)
(CNMI), LLC and IMPERIAL PACIFIC)
INTERNATIONAL HOLDINGS LTD.,)

Defendants.)

Case No.. 1:20-CV-00031

MOTION FOR PERMISSION TO SEND
OUT CLASS NOTICE

Plaintiffs request authorization from the Court to send out to class members the class action notice that the Court approved on March 18, 2022 (Minutes, ECF No. 58). Pursuant to the Court's instructions, class counsel also files herewith as exhibits (1) a declaration by Plaintiff Özcan Genç attesting to the certified Turkish translation of the class action notice and the contact information of class members; (2) the certified Turkish translation and the English original of the notice; and (3) a list of class members with contact information redacted. Separately, also pursuant to the Court's instructions, class counsel will submit to the Clerk an unredacted version of the list of class members and a proposed order.

Respectfully submitted this 28th day of April, 2022.

BANES HOREY BERMAN & MILLER, LLC

/s/

by Richard C. Miller, Senior Counsel